

UNITED STATES BANKRUPTCY COURT  
FOR WESTERN DISTRICT OF PENNSYLVANIA

IN RE:

2019 JUL -8 A 11: 33

Karen A. Skaro  
John J. Skaro

Debtors

Karen A. Skaro

Plaintiff

v.

Brian W. Jones

Defendant

BK No. 13-25225-TPA

Chapter 13

Document No.

Related document No. 312

CLERK  
U.S. BANKRUPTCY COURT  
PITTSBURGH

**DEFENDANT'S PRETRIAL NARRATIVE STATEMENT**

(4)

a. Defendant amended his proof of claim to reflect any payments made reduced the balance of the original claim. The amended claim reflects that there is no longer exists a security interest in any real property or the accounts garnished at PNC Bank. The amended claim emphasizes the judicial lien which stems from the sheriff Levy on personal property which was part of the original proof of claim.

b. Defendant admits that he incorrectly calculated the balance owed on proof of claim. The amended claim more properly should have been \$10,811.64 plus any post petition judgment interest.

c. Defendant has stipulated as to the current value of the vehicles in question, namely-the 1971 Chevrolet Malibu with a value of \$9000.00 and the 1966 Ford Galaxy with a value of \$7500.00.

d. Defendant agrees that plaintiff is entitled to avoid the judicial lien to the extent it impairs the exemptions claimed in the statement of financial affairs. Defendant objects to any additional exemptions on the vehicles in question.

Next

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Brian W. Jones", is written over a horizontal line.

Brian W. Jones, pro se  
4960 William Flynn Hwy.  
Suite 6, PMB 185  
Allison Paik, PA 15101  
Phone: 724-300-1399  
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**CERTIFICATE OF SERVICE**

I, the undersigned, certify that I served or caused to be served, on July 3, 2019, a copy of the above answers to complaint filed herewith upon each of the following persons and parties in interest at the addresses shown below:

Ronda J. Winnecour  
Suite 3250, USX Tower  
600 Grant Street  
Pittsburgh, PA 15219

Brian C. Thompson Esq.  
125 Warrendale-Bayne Road, Suite 200  
Warrendale, PA 15086

Method of Service: Mail first class;

Date: July 3, 2019



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